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**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

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**SEP 23 1998**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
1998 Biennial Regulatory Review	)	
Conducted Emission Limits Below	)	ET Docket No. 98-80
30 MHz for Equipment Regulated	)	
Under Parts 15 and 18 of the	)	
Commission's Rules	)	

Reply Comments of Jacor Communications Company:

**INTRODUCTION AND SUMMARY**

Jacor Communications Company, and its subsidiary companies, own the second largest number of radio stations in the United States. Approximately one-third of Jacor's radio stations are AM broadcast facilities; those stations are located in markets as large as Los Angeles to markets as small as Casper and Cheyenne, Wyoming. Our programming serves the audience in each of our markets by providing timely and important information of interest to the communities within our coverage areas.

Jacor supports those those comments that urge retention and strengthening of the emission limits from devices regulated under Parts 15 and 18 of the Commission's Rules. We urge the Commission to continue protection of the AM broadcast service through regulation of those devices that affect broadcast reception.

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## **RADIO LISTENING PATTERNS AND EFFECTS OF INTERFERENCE**

The AM broadcast service is most susceptible to interference from atmospheric conditions, pulse interference, power line arcing, and emissions from Part 15 and Part 18 devices. As a result of receiver bandwidth limiting and dynamic range compression of program material (to maintain high modulation levels), the AM service has evolved into a service best suited to the transmission of speech and lower fidelity program material. With speech transmission, the pauses in the program material accentuate the perception of interference that is present in the received signal. In other words, interference is more objectionable in speech-based programming.

Jacor has invested considerable time and effort in developing programming to meet the needs of our listeners. Programs such as sports broadcasts, talk shows, and news broadcasts are all carried on our AM stations. We find that many of our listeners are in fixed locations; i.e. in the home, office, or commercial locations. With the proliferation of Part 15 and Part 18 devices, the reality of interference has increased to listeners of programs transmitted on AM radio stations.

As commenters point out, it is essential that emission limits from non-licensed devices continue to protect the AM radio service. We emphasize that failure to protect the service will deprive many listeners of the ability to receive important information and quality programming.

**THE EXISTING EMISSION LIMITS OFFER LESS PROTECTION TO RADIO RECEPTION THAN BROADCAST STATIONS RECEIVE FROM OTHER BROADCASTERS**

The current AM broadcast rules offer protection to AM reception within the 0.5 mV/m contour for all daytime services and nighttime skywave service. The nominal protection requirement for nighttime groundwave service to class B stations is 2 mV/m; this is also the value that is assumed to provide adequate service to communities with population greater than 2500 persons. The established interference ratio for AM co-channel interference is 26 dB, meaning that the greatest allowable co-channel interfering signal is 25 microvolts/meter for the 0.5 mV/m contour and 100 microvolts/meter for the 2 mV/m contour.

The current conducted interference limit for non-licensed devices operating under Part 15 and Part 18 is 250  $\mu$ V/m, with a higher limit of 1000  $\mu$ V/m applying to certain devices. This limit is clearly inadequate to protect AM receivers located near such devices, and offers significantly lower interference protection than co-channel AM stations offer to each other.

We concur with the technical study conducted by the National Association of Broadcasters (NAB) that shows the current limits to be inadequate to protect the AM service. We urge the Commission to retain the current emission limits and institute a Notice of Proposed Rulemaking (NPRM) to propose more restrictive limits in the AM broadcast band.

**THE PRESENT "CLASS A" AND "CLASS B" LIMITS SHOULD BE REPLACED  
BY A SINGLE LIMIT EQUIVALENT TO CURRENT "CLASS B" LIMITS**


Jacor finds that considerable listening to AM broadcast stations occurs in offices and homes in the vicinity of computer equipment. The current distinction between commercial equipment ("Class A") and home equipment ("Class B") is ineffective in providing protection to AM broadcast reception. One need only look to the proliferation of home offices and the sales of business and commercial equipment at office superstores to realize that a considerable amount of "Class A" equipment finds its way into the home, where lower limits would normally be expected. Further, with the amount of listening at work, as noted in the NAB comments, a single, restrictive standard is necessary to protect AM reception in commercial locations.

Jacor urges the Commission to institute an NPRM to eliminate this discrepancy.

**CONCLUSION**

Jacor commends the Commission for undertaking a review of its technical rules for Part 15 and Part 18 devices. We urge the Commission to use this opportunity to improve the protections offered to AM broadcasters as a further step in the process of retaining AM as a viable and vibrant radio service.

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